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EXHIBIT A
(Proposed Order)

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)
(Jointly Administered)

**[PROPOSED] ORDER FURTHER
EXTENDING DEADLINE FOR THE
REORGANIZED DEBTORS TO OBJECT
TO CLAIMS AND GRANTING RELATED
RELIEF**

1 Upon the Motion, dated October 25, 2022, (the “**Motion**”)¹ of PG&E Corporation and
2 Pacific Gas and Electric Company, as debtors and reorganized debtors (together, the “**Debtors**” or
3 the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”),
4 in accordance with Section 7.1 of the Plan, sections 105(a) and 1142 of title 11 of the United States
5 Code (the “**Bankruptcy Code**”), and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure
6 (the “**Bankruptcy Rules**”), for entry of an order extending the deadline for the Reorganized Debtors
7 to object to claims by an additional two hundred seventy (270) days, through and including
8 September 15, 2023, without prejudice to the Reorganized Debtors’ right to seek additional
9 extensions thereof; and consideration of the Motion and the requested relief being a core proceeding
10 pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C.
11 §§ 1408 and 1409; and the Court having found and determined that notice of the Motion as provided
12 to the parties listed therein is reasonable and sufficient, and it appearing that no other or further
13 notice need be provided; and this Court having reviewed the Motion and the McWilliams
14 Declaration submitted in support thereof; and this Court having determined that the legal and factual
15 bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that
16 the relief requested in the Motion is in the best interests of the Debtors, their estates, creditors,
17 shareholders, and all parties in interest; and upon all of the proceedings had before this Court and
18 after due deliberation and sufficient cause appearing therefor,

19 **IT IS HEREBY ORDERED THAT:**

- 20 1. The Motion is granted as provided herein.
- 21 2. The deadline for the Reorganized Debtors to object to Claims under Section 7.1 of the
22 Plan (as approved by Paragraph 31 of the Confirmation Order) is further extended by two hundred
23 seventy (270) days, through and including September 15, 2023, without prejudice to the right of the
24 Reorganized Debtors to seek additional extensions thereof.

25 ¹ Capitalized terms used but not herein defined have the meanings ascribed to such terms in the
26 Motion, the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated*
27 *June 19, 2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together
28 which any exhibits or schedules thereto, the “**Plan**”), or the *Order Confirming Debtors’ and*
Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket
No. 8053] (the “**Confirmation Order**”), as applicable.

1 3. Consistent with the Plan and the Confirmation Order, the Debtors and Reorganized
2 Debtors shall have no obligation to object to Fire Victim Claims or Subrogation Wildfire Claims,
3 nor shall any such non-objection constitute an allowance or deemed allowance of any Fire Victim
4 Claim or Subrogation Wildfire Claim. Pursuant to the Plan and the Confirmation Order, all Fire
5 Victim Claims and Subrogation Wildfire Claims have been channeled to the Fire Victim Trust or
6 the Subrogation Wildfire Trust, as applicable, and shall be resolved by the applicable Fire Victim
7 Trust or Subrogation Wildfire Trust, in each case, without any recourse to or Claims whatsoever
8 against the Debtors or Reorganized Debtors or their assets and properties.

9 4. For the avoidance of doubt, the relief granted herein does not apply to the existing
10 deadline for the Reorganized Debtors to object to the United States Claims.

11 5. This Court shall retain jurisdiction to hear and determine all matters arising from or
12 related to the implementation, interpretation, or enforcement of this Order.

13 ** END OF ORDER **
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